

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
(ALBANY DIVISION)**

MEREDIAN HOLDINGS GROUP, INC.,) MEREDIAN, INC. and) DANIMER SCIENTIFIC, LLC,)) Plaintiffs,)) v.)) PAUL PEREIRA, ALTON GROUP, LLC,) ALTON CONSULTING GROUP, LLC,) ALTON GROUP, INC., ALTON BIO, LLC,) ALTON BIO I, LLC, RACHAEL PEREIRA) and THE HOUSE OF MIAMI, LLC,)) Defendants.) _____)	CIVIL ACTION NO.: 1:16-CV-124
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NOTICE OF REMOVAL

Defendant, ALTON CONSULTING GROUP, LLC, through its undersigned counsel, hereby gives notice of removal of a civil action from the Superior Court of Decatur County, State of Georgia, to the United States District Court for the Middle District of Georgia, Albany Division, pursuant to 28 U.S.C. §§ 1441 and 1446. The grounds for removal are as follows:

1. The underlying action was initiated by Plaintiff on May 18, 2016, by filing a Complaint in the Superior Court of Decatur County, State of Georgia. The case was assigned Case No: 16CV00254.

2. The Summons and a copy of the Complaint were served on all

Defendants on June 8, 2016. Pursuant to 28 U.S.C. §1446(a), a genuine and complete copy of the Summons and a copy of the Complaint are attached hereto and made a part hereof as Exhibit “A.” No other process, pleadings, or orders were served on Defendants.

3. This Notice of Removal is timely under 28 U.S.C. §1446(b) as it is filed on or before July 8, 2016, that being thirty (30) days from the service of the Summons and a copy of the Complaint. In addition, the date on or before which Defendant ALTON CONSULTING GROUP, LLC is required to file responsive pleadings to Plaintiffs’ Complaint has not lapsed.

4. This Court has jurisdiction over this dispute under 28 U.S.C. §1332 (diversity of citizenship) as the Plaintiffs and Defendants are citizens of different states and were so at the time of filing of the state court action.

5. Plaintiffs, MEREDIAN HOLDINGS GROUP, INC., MEREDIAN, INC. and DANIMER SCIENTIFIC, LLC, are each a Georgia corporation, with their principal places of business in Georgia, and as such are each a citizen of Georgia. See Complaint at paragraphs 4, 5 and 6.

6. Defendants ALTON CONSULTING GROUP, LLC, ALTON GROUP, LLC, ALTON BIO, LLC, ALTON BIO I, LLC and THE HOUSE OF MIAMI, LLC, are each Florida entities, with their principal place of business in Florida, and as such are each a citizen of Florida. See Complaint at paragraphs 9,

10, 12, 13 and 15.

7. Defendant, ALTON GROUP, INC., is/was a Belize entity, with its principal place of business in Florida, and as such is/was a citizen of Belize. See Complaint at paragraph 11.

8. Note that Defendant, ALTON CONSULTING GROUP, LLC, was formerly known as [THE] ALTON GROUP, LLC.

9. Defendants, PAUL PEREIRA and RACHAEL PEREIRA, are individuals who are residents and citizens of Florida. See Complaint at paragraphs 8 and 14.

10. The damages, as alleged in the Complaint, exceed \$75,000. See Complaint at paragraphs 53 and 58. Hence, the amount in controversy exceeds the jurisdictional minimum set forth in 28 U.S.C. §1332.

11. The above-described action is one of which this Court has original jurisdiction under 28 U.S.C. § 1332, and is one that may be removed to this Court by Defendants, pursuant to 28 U.S.C. § 1441, in that it is a civil action between citizens of different states, and because the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

12. All other Defendants, PAUL PEREIRA, ALTON GROUP, LLC, ALTON GROUP, INC., ALTON BIO, LLC, ALTON BIO I, LLC, RACHAEL PEREIRA and THE HOUSE OF MIAMI, LLC, each are also represented by

undersigned counsel and consent to this removal.

13. A copy of this Notice of Removal is being filed with the Clerk of the Superior Court of Decatur, County, Georgia, as provided by 28 U.S.C. § 1446(d), and served upon Plaintiff's counsel by first class mail. A copy of the removal notice to be filed with the Clerk of Superior Court of Decatur County is attached hereto as Exhibit "B".

WHEREFORE, ALTON CONSULTING GROUP, LLC, respectfully gives notice that this action is hereby removed from the Decatur County Superior Court to the this Court on the basis of diversity jurisdiction and requests that this Court exercise jurisdiction over this matter and proceed with the resolution of this case pursuant to its removal jurisdiction.

Dated: This 1st day of July, 2016

Respectfully submitted,

By: s/ Shuli Green
Shuli L. Green
Georgia Bar No. 297460

Cohen, Cooper, Estep & Allen, LLC
3330 Cumberland Boulevard, Suite 600
Atlanta, Georgia 30339
Telephone: 404.814.0000 Ext. 205
Facsimile: 404.745.0740
sgreen@atl-lawyers.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically via the Court's ECF system and via first class mail with sufficient postage attached hereto to ensure proper delivery to:

Patricia G. Griffith
Leanne C. Mehrman
271 17th Street, N.W.
Suite 1900
Atlanta, Georgia 30363

This 1st day of July, 2016.

By: s/ Shuli Green
Shuli L. Green
Georgia Bar No. 297460

Cohen, Cooper, Estep & Allen, LLC
3330 Cumberland Boulevard, Suite 600
Atlanta, Georgia 30339
Telephone: 404.814.0000 Ext. 205
Facsimile: 404.745.0740
sgreen@atl-lawyers.com

Attorney for Defendants